

Key Issues at Initial Agency Meetings

- **Agreement between President and Governor**
- **Relationship of regulations to state MFL process**
- **Reservations of water versus actual water availability**
- **Interim Goals**
- **PIRs completed before programmatic regulations**
- **NEPA process for programmatic regulations**

Key Issues for Environmental Stakeholders

- Timing of agreement between President and Governor
- Expedite analysis of 245K water
- Quantifying water for the natural system
- CERP reservations process out of sync with state processes (MFLs, CUPs, etc.)
- Independent scientific review
- Measurable interim goals in regulation
- Substance, not just process in the regulations
- Regulations should confirm 80/20 new water split

Key Issues for Utility Stakeholders

- Are goals of CERP multi-purpose
- Water from initial projects all goes to restoration
- Timing of CUPs, CERP, and MFLs
- Reservations versus actual availability of water
- Interim goals need to apply to other CERP purposes, not just restoration
- How will the consultation process with agencies work
- Concerns about impact of ASR bill on CERP implementation

Key Issues for Agricultural Stakeholders

- Regulation should be process
- Timing of concurrence review of regulations
- Create one set of guidelines for Federal and state processes
- Program sequencing should reflect prioritization based on the most productive projects first
- Procedures needed for PIRs - analytical framework (project selection and scaling), cost effectiveness, and prioritizing projects
- RECOVER teams and performance measures focus almost exclusively on restoration, not other needs
- Difficult to set interim goals now
- Need procedures for fiscal accountability

Initial Issues to be Resolved

- Amount of “substance” in regulations
- Interim goals
- Timing of concurrence requirements and revisions to draft regulation
- Coupling implementation of state water law and CERP
- Reservations versus actual availability of water
- Reservations process and timing

What's Coming Up

- Draft outline of regulation
- Second round of agency, stakeholder, and public meetings
- RECOVER protocol papers